

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PROXENSE, LLC,

Plaintiff,

vs.

SAMSUNG ELECTRONICS, CO., LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

Case Nos. 6:21-cv-00210-ADA

JURY TRIAL DEMANDED

[REDACTED]

PUBLIC VERSION

**DECLARATION OF JASON WILLIAMS IN SUPPORT OF
SAMSUNG'S RESPONSE TO PROXENSE'S MOTIONS *IN LIMINE***

I, Jason Williams, declare as follows:

1. I am an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, counsel of record for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. I have personal knowledge of the facts in this declaration and, if called upon to do so, could and would testify competently as to the matters set forth herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of Samsung's Preliminary Invalidity Contentions, dated August 26, 2021, (highlighted for the Court's convenience).

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the Opening Expert Report of Dr. Seth James Nielson, dated October 4, 2022 (highlighted for the Court's convenience).

4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the expert report of Mr. W. Christopher Bakewell, dated September 12, 2022 (highlighted for the Court's convenience).

5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of Samsung's First Supplemental Objections and Responses to Proxense's Interrogatories 1-14, dated August 8, 2022, (highlighted for the Court's convenience).

6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of Proxense's Responses to Samsung's Request for Admission 1-44, dated August 8, 2022, (highlighted for the Court's convenience).

7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the deposition of John Giobbi, taken on July 28, 2022 (highlighted for the Court's convenience).

8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the Rebuttal

Expert Report of Dr. Seth James Nielson, dated September 30, 2022 (highlighted for the Court's convenience).

9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts of Samsung's Responses to Proxense's Interrogatories 15-29, dated August 8, 2022, (highlighted for the Court's convenience).

10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts of the opening expert report of Dr. Aviel David Rubin, dated August 15, 2022 (highlighted for the Court's convenience).

11. Attached hereto as Exhibit 10 is a true and correct copy of excerpts of the rebuttal expert report of Dr. Aviel David Rubin, dated September 12, 2022 (highlighted for the Court's convenience).

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 5, 2022 at New York.

/s/ Jason Williams
Jason Williams